

LAW OFFICES OF BRONZE & TANG

A Professional Corporation

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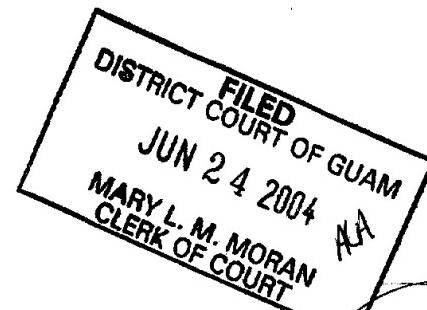
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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.



IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S)	
INC., a Guam corporation,)	
)	
Plaintiffs,)	HSBC's NOTICE OF EX PARTE
)	APPLICATION AND EX PARTE
v.)	APPLICATION FOR LETTERS OF
)	REQUEST FOR TAKING THE
HONGKONG AND SHANGHAI)	DEPOSITION AND PRODUCTION
BANKING CORPORATION, LTD.,)	OF DOCUMENTS OF VASHI
et al.,)	JADWANI IN THE REPUBLIC OF
)	THE PHILIPPINES
Defendants.)	
)	

TO: Plaintiffs, and their attorneys of record, ARRIOLA, COWAN & ARRIOLA

NOTICE IS HEREBY GIVEN that on _____, 2004, at the hour of
_____.m., Defendant Hongkong and Shanghai Banking Corporation, Limited ("HSBC"), will
bring the following *Ex Parte* Application before the Court.

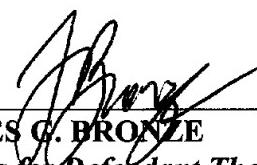
Concurrently with this *Ex Parte* Application, HSBC has filed an *Ex Parte* Motion for
Letters of Request for Taking the Deposition and Production of Documents of Vashi Jadwani in
the Republic of the Philippines.

This *Ex Parte* Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in Support of said Motion, and the documents on file herein all being incorporated herein by this reference. This *Ex Parte* Application is further supported by the Declaration of Jacques G. Bronze concurrently filed herewith.

DATED this 24th day of June 2004.

**LAW OFFICES OF BRONZE & TANG
A Professional Corporation**

By:


JACQUES G. BRONZE

*Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation, Ltd.*